

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION**

Case No.: 22-cv-20712-RKA

PENINSULA PETROLEUM LIMITED,  
Plaintiff,

v.

CI INTERNATIONAL FUELS LLC,  
Defendant.

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**DEFENDANT’S MOTION FOR ENLARGEMENT OF TIME  
TO RESPOND TO PLAINTIFF’S REQUEST FOR PRODUCTION**

Defendant, CI INTERNATIONAL FUELS LLC, (“CI”), respectfully submits this Motion for Enlargement of time to respond to Plaintiff’s First Request for Production, and in support thereof states as follows:

1. On November 8, 2022, Plaintiff’s verified Amended Complaint was filed (DE 38).
2. On May 5, 2023, a Joint Motion to Extend the Discovery Cutoff was filed. (DE 72).
3. Thereafter, on May 10, 2023, the Court entered an order extending the discovery deadline to July 14, 2023. (DE 73).
4. Defendant filed its Reply to Plaintiff’s Response to Defendant’s Renewed Motion to Dismiss on April 12, 2023, which remains pending before the Court. (DE 71).
5. On April 19, 2023, Plaintiff served its First Request for Production, making a response due by May 19, 2023.
6. One week later on April 26, 2023, Plaintiff served a Second Request for Production and First Set of Interrogatories.

7. Defendant seeks a 15-day extension to respond due Plaintiff's First Request for Production because Counsel for Defendant was out of the State and country for more than two weeks in April due to a death in the family and prior business engagements. As such, Counsel needs additional time to respond to Plaintiff's First Request for Production.
8. This request is not undertaken for purposes of delay and the Plaintiff will not be prejudiced by the granting the Defendant's Motion for Enlargement of Time to Respond to Plaintiff's First Request for Production.

WHEREFORE, for good cause shown, Defendants respectfully request this Court to issue an Order extending the deadline to respond to Plaintiff's First Request for Production by 15 days.

#### **CERTIFICATE OF GOOD FAITH CONFERENCE**

Pursuant to Local Rule 7.1(a)(3), the undersigned hereby certifies that she has conferred with Plaintiff's counsel regarding the relief sought in this motion and Plaintiff's Counsel does not agree to Counsel for the Defendants' request for an extension of time. The undersigned counsel further certifies that this motion is made in good faith and not for purposes of delay.

Dated: May 18, 2023

#### **CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing was electronically filed electronically to all counsels for the parties via the CMECF E-Filing Portal on this 18<sup>th</sup> day of May, 2023.

Respectfully Submitted,

**SANCHEZ VADILLO, LLP**  
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